

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
SOUTHERN DIVISION**

UNITED STATES OF AMERICA ex rel.;  
CORI RIGSBY; AND KERRI RIGSBY

RELATORS/COUNTER-DEFENDANTS

v.

CASE No. 1:06-cv-433-LTS-RHW

STATE FARM MUTUAL  
INSURANCE COMPANY, et al.

DEFENDANTS/COUNTER-PLAINTIFFS

**RELATORS' RESPONSE TO STATE FARM'S MOTION TO CLARIFY  
THE NON-APPLICATION OF MISSISSIPPI COMPETENCY LAW**

Cori and Kerri Rigsby (“Relators”) do not oppose State Farm’s request for an order clarifying the application of Mississippi’s engineering license requirements to this case. Miss. Code Ann. § 73-13-1, *et seq* (“the Statute”). The Relators expressly reserve all rights under the Federal Rules of Evidence to challenge experts designated by the other parties. The Relators further reserve all rights to challenge experts based on the application of the Statute, should the Court determine that the Statute is applicable to this case.

THIS the 23rd day of December, 2009

Respectfully, submitted,

/s/ C. Maison Heidelberg  
C. MAISON HEIDELBERG, MB #9559  
GINNY H. KENNEDY, MB#102199

OF COUNSEL  
August J. Matteis, Jr. (*admitted pro hac vice*)  
Craig J. Litherland (*admitted pro hac vice*)  
Scott D. Gilbert (*admitted pro hac vice*)  
Benjamin Davidson (*admitted pro hac vice*)  
GILBERT LLP  
1100 New York Avenue NW, Suite 700  
Washington, DC 20005  
Fax No. (202) 772-3333  
Phone No. (202) 772-2200

Attorneys for Cori Rigsby and Kerri Rigsby  
MAISON HEIDELBERG PA  
795 Woodlands Parkway, Suite 220  
Ridgeland, Mississippi 39157  
Phone No. (601) 351-3333  
Fax No. (602) 956-2090

**CERTIFICATE OF SERVICE**

I, C. Maison Heidelberg, attorney for Cori Rigsby and Kerri Rigsby, do hereby certify that I have this day caused a true and correct copy of the foregoing instrument to be delivered to the following, via the means direct by the Court's Electronic Filing System:

Dunn O. Lampton, Esq.  
UNITED STATES ATTORNEY  
FOR MISSISSIPPI  
188 East Capitol Street, Suite 500  
Jackson, MS 39201

Felicia Adams, Esq.  
ASSISTANT U.S. ATTORNEY  
188 East Capitol Street, Suite 500  
Jackson, MS 39201

Joyce R. Branda, Esq.  
Patricia R. Davis, Esq.  
Jay D. Majors, Esq.  
UNITED STATES DEPARTMENT OF JUSTICE  
Commercial Litigation Branch  
Civil Division  
601 D Street, NW  
Washington, DC 20004

Larry G. Canada, Esq.  
Kathryn Breard Platt, Esq.  
Galloway, Johnson, Tompkins, Burr & Smith  
701 Poydras Street, Suite 4040  
New Orleans, LA 70139  
(p) 504-525-6802  
ATTORNEYS FOR HAAG ENGINEERING CO.

Robert C. Galloway, Esq.  
Emerson Barney Robinson, III, Esq.  
Jeffrey A. Walker, Esq.  
BUTLER, SNOW, O'MARA,  
STEVENS & CANNADA, PLLC  
P.O. Box 22567  
Jackson, MS 39225  
(p) 601-948-5711

Michael B. Beers, Esq.  
BEERS, ANDERSON, JACKSON  
PATTY & FALWAL, PC  
250 Commerce Street, Suite 100  
Montgomery, AL 36104  
(p) 334-834-5311  
ATTORNEYS FOR STATE FARM MUTUAL  
INSURANCE COMPANY

Robert D. Gholson  
GHOLSON BURSON ENTREKIN & ORR, P.A.  
55 North 5th Avenue  
P.O. Box 1289  
Laurel, MS 39441-1289  
ATTORNEYS FOR FORENSIC ANALYSIS  
ENGINEERING CORPORATION

/s/ C. Maison Heidelberg